

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

BNP PARIBAS S.A.,

BNP PARIBAS (SUISSE) S.A., Individually and  
as Successor in Interest to BNP Paribas Private  
Bank (Switzerland) S.A. and as Successor in  
Interest to United European Bank,

BNP PARIBAS ARBITRAGE SNC,

BNP PARIBAS BANK & TRUST (CANADA),

BNP PARIBAS BANK & TRUST CAYMAN  
LIMITED,

BGL BNP PARIBAS LUXEMBOURG S.A., as  
Successor in Interest to BNP Paribas Luxembourg  
S.A.,

BNP PARIBAS SECURITIES SERVICES—  
SUCCURSALE DE LUXEMBOURG, and

BNP PARIBAS SECURITIES SERVICES S.A.,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01576 (SMB)

**STIPULATION EXTENDING TIME  
TO RESPOND AND ADJOURNING  
THE PRE-TRIAL CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED, by and between plaintiff Irving H. Picard, as trustee (the “Trustee”) for the substantively consolidated SIPA liquidation of Bernard L. Madoff Investment Securities and the estate of Bernard L. Madoff, and defendants BNP Paribas S.A., BNP Paribas (Suisse) S.A., BNP Paribas Arbitrage SNC, BNP Paribas (Canada) sued here as BNP Paribas Bank & Trust (Canada), BNP Paribas Bank & Trust Cayman Limited, BGL BNP Paribas Luxembourg S.A., BNP Paribas Securities Services—Succursale de Luxembourg, and BNP Paribas Securities Services S.A. (collectively, “Defendants”), by and through their undersigned counsel herein, that the time by which Defendants may move, answer, or otherwise respond to the Trustee’s complaint (the “Complaint”) is extended up to and including July 16, 2014. The pre-trial conference will be adjourned from July 30, 2014, at 10:00 a.m. to September 17, 2014, at 10:00 a.m.

The purpose of this stipulated extension (“Stipulation”) is to provide additional time for Defendants to move, answer, or otherwise respond to the Complaint. This is the eleventh such extension. Nothing in this Stipulation is a waiver of Defendants’ right to request from the Court a further extension of time to move, answer, or otherwise respond to the Complaint and/or the Trustee’s right to object to any such request.

The parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation, any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photocopy, or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting

Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial  
Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 5600).

Dated: May 15, 2014  
New York, New York

**BAKER & HOSTETLER LLP**

By: /s/ Thomas L. Long  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Marc E. Hirschfield  
Email: mhirschfield@bakerlaw.com  
Thomas L. Long  
Email: tlong@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for  
the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Estate of  
Bernard L. Madoff*

**CLEARY GOTTlieb STEEN &  
HAMILTON LLP**

By: /s/ Breon S. Peace  
One Liberty Plaza  
New York, New York 10006  
Telephone: (212) 225-2000  
Facsimile: (212) 225-3999  
Breon S. Peace  
Email: bpeace@cgsh.com  
Ari MacKinnon  
Email: amackinnon@cgsh.com

*Attorneys for BNP Paribas S.A., BNP  
Paribas (Suisse) S.A., BNP Paribas  
Arbitrage SNC, BNP Paribas (Canada)  
sued here as BNP Paribas Bank &  
Trust (Canada), BNP Paribas Bank &  
Trust Cayman Limited, BGL BNP  
Paribas Luxembourg S.A., BNP  
Paribas Securities Services—  
Succursale de Luxembourg, and BNP  
Paribas Securities Services S.A.*